

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA
ex rel. ERMA LEE,

Plaintiffs,

v.

TARRANT COUNTY HOSPITAL
DISTRICT d/b/a JPS HEALTH NETWORK,

Defendant.

Civil Action No. 4:19-cv-00412-P

**JOINT STIPULATION OF DISMISSAL AND
CONSENT OF THE UNITED STATES TO DISMISSAL**

Pursuant to Rule 41(a)(1)(a)(ii) of the Federal Rules of Civil Procedure and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), Erma Lee (Relator) and Tarrant County Hospital d/b/a JPS Health Network (JPS) (collectively, the Parties), with the consent of the United States of America, jointly stipulate to the dismissal of the above-captioned action based on the terms of the Settlement Agreement between the United States and the Parties effective August 17, 2021. In accordance with the Settlement Agreement, the Parties jointly stipulate to dismiss the claims asserted in this action as to JPS: (1) with prejudice as to Relator; (2) with prejudice as to the United States for the Covered Conduct set out in Section E of the Settlement Agreement; and (3) without prejudice as to the United States as to any other claims.

Respectfully Submitted,

Date: August 17, 2021

REESE MARKETOS LLP



JOSHUA M. RUSS
Texas Bar No. 24074990
josh.russ@rm-firm.com
750 N. Saint Paul St., Suite 600
Dallas, Texas 75201
Telephone (214) 382-9810
Facsimile: (214) 501-0731

Counsel for Relator Erma Lee

Date: August 12, 2021

RACHEL V. ROSE—
ATTORNEY AT LAW, PLLC





RACHEL V. ROSE
Texas Bar No. 24074982
rvrose@rvrose.com
P.O. Box 22718
Houston, Texas 77227
Telephone: (713) 907-7442
Facsimile: (855) 558-1745

Counsel for Relator Erma Lee

Date: August 17, 2021

BRADLEY ARANT BOULT
CUMMINGS LLP

GENE R. BESEN

Texas Bar No. 24045491
gbesen@bradley.com
4400 Renaissance Tower
1201 Elm Street
Dallas, Texas 75270
Telephone: (214) 939-8700
Facsimile: (214) 939-8787

JASON P. MEHTA
Florida Bar No. 120126
jmehta@bradley.com
100 N Tampa Street, Suite 2200
Tampa, FL 33602
Telephone: (813) 559-5500
Facsimile: (813) 229-5946

*Counsel for Defendant Tarrant County
Hospital District*

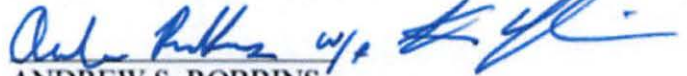
CONSENT OF UNITED STATES TO DISMISSAL

Pursuant to 31 U.S.C. § 3730(b)(1), the United States consents to the dismissal of the action as follows: (a) with prejudice as to the United States for claims the United States has against JPS under the False Claims Act, 31 U.S.C. §§ 3729-3733, for the Covered Conduct set out in Section E of the Settlement Agreement; and (b) without prejudice as to the United States as to any other claim.

The United States consents to such dismissal because it is pursuant to a Settlement Agreement that is fair, adequate, and reasonable.

PRERAK SHAH

Acting United States Attorney

A handwritten signature in blue ink, appearing to read "Andrew Robbins w/ #", is written over the printed name of Andrew S. Robbins.

ANDREW S. ROBBINS

Assistant United States Attorney

New York Bar No. 4836508

1100 Commerce Street, Third Floor

Dallas, Texas 75242-1699

Telephone: 214-659-8697

Facsimile: 214-659-8807

andrew.robbs@usdoj.gov

Counsel for the United States

CERTIFICATE OF SERVICE

On August 17, 2021, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).



Joshua M. Russ